

# EXHIBIT 33

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SWISSDIGITAL USA CO., LTD.,

Plaintiff,

v.

SAMSONITE INTERNATIONAL S.A.;  
SAMSONITE LLC; SAMSONITE  
COMPANY STORES, LLC; and DIRECT  
MARKETING VENTURES, LLC,

Defendants.

Civil Action No. 1:24-cv-11636

**JURY TRIAL DEMANDED**

**DEFENDANTS' FIRST SET OF INTERROGATORIES TO  
SWISSDIGITAL USA CO., LTD. (NOS. 1-4)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants Samsonite International S.A., Samsonite LLC, Samsonite Company Stores, LLC, and Direct Marketing Ventures, LLC (collectively, "Samsonite" or "Defendants") hereby requests that Plaintiff Swissdigital USA Co., Ltd. ("Swissdigital" or "Plaintiff") answer each interrogatory set forth below, in writing and under oath, within thirty days of service hereof, in accordance with the definitions and instructions below.

**DEFINITIONS**

1. Unless otherwise specified, all terms shall be interpreted as they are used in the Federal Rules of Civil Procedure. The Requests and terms used herein shall be construed to require the fullest and most complete disclosures permitted by law.
2. "Samsonite" or "Defendants" means Samsonite International S.A., Samsonite LLC, Samsonite Company Stores, LLC, and Direct Marketing Ventures, LLC.

3. “Swissdigital,” “Plaintiff,” “You,” or “Your” means all officers, directors, employees, agents, consultants, attorneys, predecessors, subsidiaries, parents, affiliates, contractors, and any other Person or entity acting on behalf of any of the foregoing.

4. “Asserted Patents” means United States Patents 10,574,071 (“the ‘071 patent”); 10,931,137 (the “‘137 patent”); 10,931,138 (the “‘138 patent”); and 11,601,009 (the “‘009 patent”), together with any patents Swissdigital later asserts in this action.

5. “Related Patent” means:

- a) Any patent or patent application in the genealogical chain through which an Asserted Patent claims priority;
- b) Any patent or patent application which claims priority through a genealogical chain that includes an Asserted Patent; and/or
- c) Any foreign counterpart of an Asserted Patent or otherwise Related Patent.

6. “Asserted Claims” means each and every claim of the Asserted Patents that Swissdigital contends is infringed by Samsonite. “Asserted Claim” refers to any one of the Asserted Claims.

7. “Accused Products” means the Samsonite products identified in Swissdigital’s Local Rule 16.6(d) Automatic Patent-Related Disclosure or any amendments or supplements thereto.

8. “Related Products” means the products Swissdigital sold or sells that it contends embody or practice one or more claims of the Asserted Patents.

9. “Document(s)” is used in the broadest sense to include everything contemplated by Rule 34(a)(1)(A) of the Federal Rules of Civil Procedure and by Rule 1001 of the Federal Rules of Evidence, including Communications. If a draft Document has been prepared in several copies that are not identical, or if the original identical copies are no longer identical due to subsequent notation, each non-identical Document is a separate Document.

10. "Thing(s)" is used in the broadest sense to include everything contemplated by Rule 34(a)(1)(B) of the Federal Rules of Civil Procedure.

11. "Person" or "Entity" and their plural forms include, without limitation, natural persons, law firms, partnerships, corporations, associations, and any other legal entities and divisions, departments, or other units thereof.

12. "Third Party" means any Person or Entity other than Swissdigital or Samsonite.

13. "Communication" means any transmission of information, including drafts, whether oral or written, whether stored in hard copy, on tape, or electronically, including conversations; correspondence; electronic mails; facsimile transmissions; telecopies; recordings; telephone or message logs; notes or memoranda; and any translations.

14. "Relating to," "related to," "relate to," and "regarding" are used in its broadest sense to include any connection, relation, or relevance.

15. "Include" and "including" shall mean including without limitation.

16. The words "and" and "or" shall be construed conjunctively or disjunctively, whichever makes the request most inclusive.

17. When reference is made in these Interrogatories to any term defined herein, the singular shall include the plural, and the plural shall include the singular.

### **INSTRUCTIONS**

1. As used herein, the phrase "describe in complete detail" shall mean to recite all facts that You have obtained, have access to, and/or are aware of, that refer or relate to the subject matter of the inquiry or request, and those phrases specifically shall mean to: (a) identify the source or sources of each stated fact; (b) identify all Persons with knowledge of each stated fact; (c) identify all Communications referring to or relating to each stated fact; and (d) identify all Documents referring or relating to each stated fact.